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Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA,) No. CR 13-0554 JST
14 Plaintiff,)
15 v.) STIPULATION AND PROPOSED ORDER
16 GUILLERMO ESPARZA,) EXCLUDING TIME UNDER 18 U.S.C. § 3161
17 Defendant.)
18)
)
)
)

19 On November 15, 2013, the parties made an initial status appearance before the Court. During
20 that status appearance, the parties explained to the Court that most of the discovery had been provided to
21 defense counsel, but that defense counsel was awaiting the delivery of additional discovery such as lab
22 and cell phone forensics. Therefore, the parties requested, and the Court ordered, that another status
23 appearance be set for December 20, 2013, at 9:30 a.m. The parties also requested, and the Court
24 ordered, that the time between November 15, 2013 and December 20, 2013, be excluded from the
25 running of the speedy trial clock for effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv).
26 The parties agree that, taking into account the public interest in prompt disposition of criminal cases,
27 good cause exists for this extension. The parties also agreed that the ends of justice served by granting
28 such a continuance outweighed the best interests of the public and the defendant in a speedy trial. 18

1 U.S.C. § 3161(h)(7)(A).

2 SO STIPULATED:

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4 MELINDA HAAG
United States Attorney

5
6 DATED: November 15, 2013

7 /S/
NATALIE LEE
Assistant United States Attorney

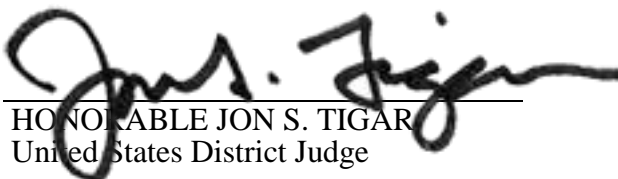
8
9 DATED: November 15, 2013

10 /S/
ELLEN LEONIDA
Attorney for Guillermo Esparza

11 For the reasons stated above, the Court finds that the exclusion of time from November 15, 2013
12 through December 20, 2013 is warranted and that the ends of justice served by the continuance outweigh
13 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161 (h)(7)(A). The
14 failure to grant the requested continuance would deny the defendant effective preparation of counsel and
15 would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).

16 SO ORDERED.

17
18 DATE: November 18, 2013

19 
HONORABLE JON S. TIGAR
United States District Judge